



REMARKS

Claims 7 and 9 are pending in this application. By the Office Action, the drawings are objected to and claims 7 and 9 are rejected under 35 U.S.C. §103. In view of the following remarks, reconsideration and allowance are respectfully requested.

I. Objection to Drawings

The Office Action objects to the drawings under 37 C.F.R. §1.83(a), as not showing the stationary display member having the claimed laminated structure. Applicants respectfully traverse the objection.

Applicants respectfully submit that the laminated structure is shown in exemplary detail in Fig. 5. If further detail is believed necessary, then the Examiner is requested to more specifically state the basis of the objection.

Accordingly, reconsideration and withdrawal of the objection are respectfully requested.

II. Rejection Under 35 U.S.C. §103

The Office Action rejects claims 7 and 9 under 35 U.S.C. §103(a) over Antoniadis in view of Chien in view of Butt and further in view of Carcia. Applicants respectfully traverse the rejection.

Independent claim 9 recites a pattern display apparatus comprising: a stationary display member; and a flexible organic electroluminescent (EL) device located on an outer surface of the stationary display member, the flexible organic EL device for displaying at least one of a first character, a first figure, a first mark and a first pattern comprising at least one of a second character, a second figure and a second mark, wherein the flexible organic EL device comprises a laminated structure comprising layers ordered in the sequence of a flexible base layer, a first electrode layer, an EL layer, an insulating layer, a second electrode layer and a flexible sealing layer, and the insulating layer has a pattern, whose shape is

completely negative (opposite) to the shape of the at least one of a first character, a first figure, a first mark and a first pattern comprising at least one of a second character, a second figure and a second mark. Such a pattern display apparatus is nowhere taught or suggested by the cited references.

The requirements for a prima facie case of obviousness are specified and described in MPEP §2143. According to MPEP §2143, to establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation to modify the reference. Second, there must be a reasonable expectation of success. Third, the prior art reference must teach or suggest all the claim limitations. The references applied in the Office Action fail to teach or suggest all the claim limitations. In particular, the references do not teach or suggest at least the claimed feature that the insulating layer is between the EL layer and the second electrode layer (i.e., on the outside surface of the EL layer with respect to the base layer and stationary display member). Nor do the references provide any motivation to combine the separate disclosures and to modify the resultant combination to provide these claim features.

Antoniadis is cited for some, but far from all, of the limitations of independent claim 9. However, the Office Action admits that Antoniadis does not teach or suggest (1) the organic EL device located on a stationary display member; (2) a flexible base layer; (3) the insulating layer being between the EL layer and the second electrode layer (i.e., on the outside surface of the EL layer with respect to the base layer and stationary display member); and (4) a flexible sealing layer. The secondary references Chien, Butt, and Carcia are cited for these features (1)-(4) that are missing from Antoniadis. However, regardless of their disclosures, any combination of the references fails to teach or suggest the feature that the insulating layer is between the EL layer and the second electrode layer (i.e., on the outside surface of the EL layer with respect to the base layer and stationary display member).

With respect to the locations and relationships of the insulating layer, the EL layer, and the second electrode layer, Antoniadis teaches that the insulating layer is located directly on the bottom substrate layer. See col. 5, line 55 to col. 6, line 51. Antoniadis teaches that this order is preferred because it makes the production method easier, allowing only a single vacuum step. Col. 6, lines 46-51. Antoniadis does not teach or suggest that the insulating layer should instead be located between the EL layer and the second electrode layer. Instead, Antoniadis teaches benefits in not having the layers in this recited order, and thus teaches away from the claimed invention.

To overcome this contrary teaching of Antoniadis, the Office Action argues that Butt teaches that the insulating layer can be located at any position in the device, providing the same results. In support, the Office Action cites Butt at col. 5, lines 24-28. However, Butt does not teach locating the insulating layer between the EL layer and the second electrode layer, as claimed. Instead, Butt only teaches that the insulating layer can be located between the rear electrode and the dielectric layer (Fig. 1 and col. 3, lines 41-51), or inside the EL layer between the phosphor layer and the dielectric layer (Fig. 8 and col. 5, lines 22-24). Butt does not teach that the insulating layer can instead be located above the EL layer between the EL layer and the top (second) electrode. Accordingly, although Butt teaches alternative locations of the insulating layer, Butt does not teach or suggest the specific location of the insulating layer, as claimed.

Still further, at least in view of Antoniadis' teachings of significant benefits in locating the insulating layer directly on the bottom substrate layer, it would not have been obvious for one of ordinary skill in the art to have combined Antoniadis and Butt, and to have moved the location of the insulating layer to a position not taught by either reference. At most, the combined teachings of Antoniadis and Butt teach that the insulating layer can be located directly on the bottom substrate layer, between the rear electrode and the dielectric layer, or

inside the EL layer between the phosphor layer and the dielectric layer, but that locating it directly on the bottom substrate layer is preferred. Nowhere does either reference teach or suggest locating the insulating layer between the EL layer and the second electrode layer, or that such a location would provide any particular benefit. In fact, Antoniadis expressly teaches the opposite.

Chien and Carcia are cited for other limitations of the claim, and are not cited for the claimed location of the insulating layer. Accordingly, even if Chien and Carcia are properly combined with Antoniadis and Butt, which Applicants do not admit, the combination fails to overcome the deficiencies of Antoniadis and Butt discussed above.

For at least these reasons, claim 9 would not have been rendered obvious by Antoniadis, Chien, Butt, and Carcia. Claim 7 depends from claim 9 and, thus, also would not have been rendered obvious by the cited references. Accordingly, reconsideration and withdrawal of the rejection are respectfully requested.

III. Conclusion

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of the application are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,


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